June 8, 2001

Alliance for Telecommunications Industry Solutions

Problem Solvers to the Telecommunications Industry

VIA HAND DELIVERY

Magalie Roman Salas
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Room TW-A325
Washington, DC 20554

RECEIVED

JUN 8 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Ex Parte* Presentation in CC Docket No. 95-155 (DA-002754)

Dear Ms. Salas:

On June 1, 2001, the Alliance for Telecommunications Industry Solutions (ATIS) and its sponsored Ordering and Billing Forum (OBF) SMS/800 Number Administration Committee (SNAC) met with Commission staff to further discuss the May 16, 2001 letter from the OBF[1] (the "May 16 Letter") regarding the Disconnect Suspend Status Directive[2] (the "Directive"). The individuals representing ATIS and the SNAC were Pat Parker, Verizon, SNAC Co-lead; Ron Redfearn, WorldCom, SNAC Technical Subteam Co-lead; David Loose, Sprint; Anil Patel, DSMI; Ted Fernandez, SMT-Qwest; Ling-Ling Chu, Telcordia; YK Chen, Telcordia; Christopher Rugh, Worldwide Telegraph (via conference bridge); Megan Campbell, ATIS General Counsel; and Deseree Herring, SNAC Committee Administrator. The Commission staff in attendance included Marty Schwimmer, Attorney, NSD, CCB and Jennifer Gorny, Attorney, NSD, CCB.

The discussion was consistent with the presentation materials distributed, as well as the May 16 Letter. The presentation materials are included as an attachment to this letter. More specifically, the discussion focused on several functionality and business processes changes necessary to implement the Directive as provided for

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[1] Letter from Stephanie Cowart, OBF Moderator, to Diane Griffin Harmon, Acting Division Chief, Network Services Division, Common Carrier Division, Federal Communications Commission, dated May 16, 2001.

[2] Letter from L. Charles Keller, Chief, Network Services Division, Common Carrier Division, Federal Communications Commission to Michael Wade, President, Database Service Management, Inc., Modifying SMS/800 Disconnect and Suspend Status Functions to Preclude Transfers of Toll-Free Numbers Directly Between Subscribers, DA 00-2754 (released Dec. 7, 2000).
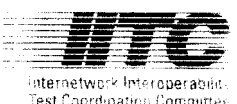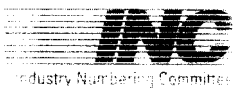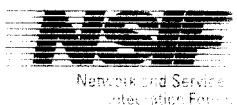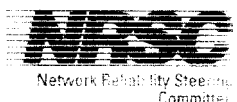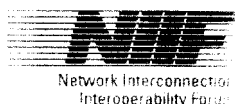
under the current proposed design. The SNAC delegation set forth an alternative proposed design that would alleviate many of the functionality and business processes problems identified by industry while working to implement the Directive.

During the discussion, an understanding was reached with respect to the override capability "written authorization" as required in the Directive. The Directive reads, in relevant part,

> "This capability may be used only in instances in which the Help Desk receives a letter (or other form of **written authorization** acceptable to the SMS/800) stating that the number was put into Disconnect Status by mistake and should be put back into Working Status, or that the number should be returned to Spare Status in less than 4 months."[3] (emphasis added)

The SNAC delegation had suggested, as part of the alternative proposed design, that the written authorization requirement be automated through the SMS/800 interfaces (i.e., online, GUI and MGI). Such a process would allow for the override justifications to be stored electronically within the system. The Commission staff acknowledged that the override capability "written authorization" requirement could be satisfied through automated means.

At the conclusion of the discussion, the Commission staff suggested that the SNAC provide the Commission with an updated timeframe, based on current progress, with respect to the requested three-month extension for the implementation of the current proposed design.[4] Accordingly, the SNAC met via conference call on June 5, 2001 and reached consensus to provide the Commission with the following updated timeframe:

> If the requirements were delivered to the Industry by August 1, 2001, testing could begin on October 10, 2001 with an implementation date set for December 8, 2001.

Pursuant to Section 1.1206(a)(1) of the Commissions Rules, ATIS submits an original and one copy of this notice of *ex parte* contact for inclusion in the public record of the above-referenced

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[3] Id. at 4.
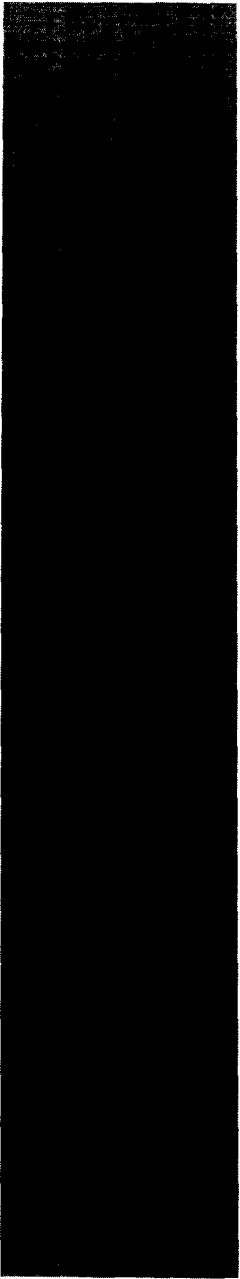
[4] See Cowart Letter, supra note 1.

proceeding. Please date-stamp and return the extra copy to our messenger. Should you have any questions regarding this matter, please contact me at 202/434-8847.

Sincerely,

Megan L. Campbell
General Counsel

Enclosures

cc: Yog Varma, Deputy Chief, CCB (yvarma@fcc.gov)
           Diane Griffen Harmon, Acting Chief, NSD, CCB (dharmon@fcc.gov)
           Martin Schwimmer, Attorney, NSD, CCB (mschwimm@fcc.gov)
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           Deseree Herring, SNAC Committee Administrator (dherring@atis.org)

SNAC Presentation to the FCC Regarding Disconnect/Suspend Functional Changes

June 1, 2001

Contact: Pat Parker, Verizon
SNAC Co-Lead
(972) 615 - 8384

SMS/800

Disconnect/Suspend Functional Changes

Normal Number Life Cycle

Aging

Number Record Status
Spare
Customer Record Status
No Record exists

Reserve

Number Record Status
Disconnect/Trans
Customer Record Status
Disconnect/No Record

Number Record Status
Reserve
Customer Record Status
No Record exists

Disconnect

Number Record Status
Assigned/Working
Customer Record Status
Sending/Active

Assign

OBF

ATIS

Non Pay Life Cycle

Return to Working

Reserve

Number Record Status
Spare
Customer Record Status
No Record exists

Number Record Status
Disconnect/Trans
Customer Record Status
Disconnect/No Record

Number Record Status
Reserve
Customer Record Status
No Record exists

Disconnect

Number Record Status
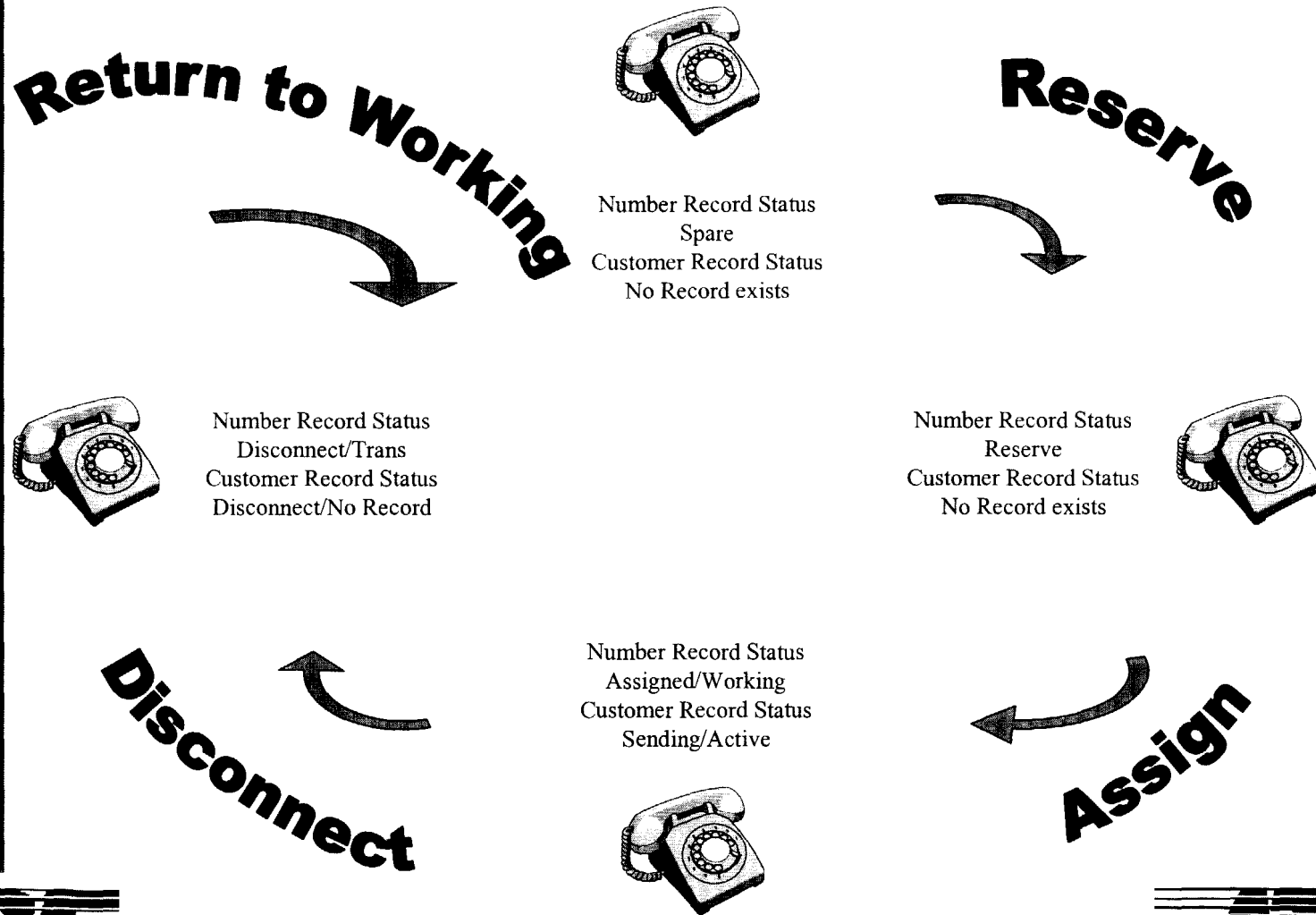Assigned/Working
Customer Record Status
Sending/Active

Assign

OBF

ATIS

Disconnect

- ## Current Proposed Design

  - Disconnect numbers only returned to spare
  - Only recovered by request to Help Desk

- ## Alternative Proposed Design

  - Automate request through Online, GUI, MGI
  - Easily monitored through reporting
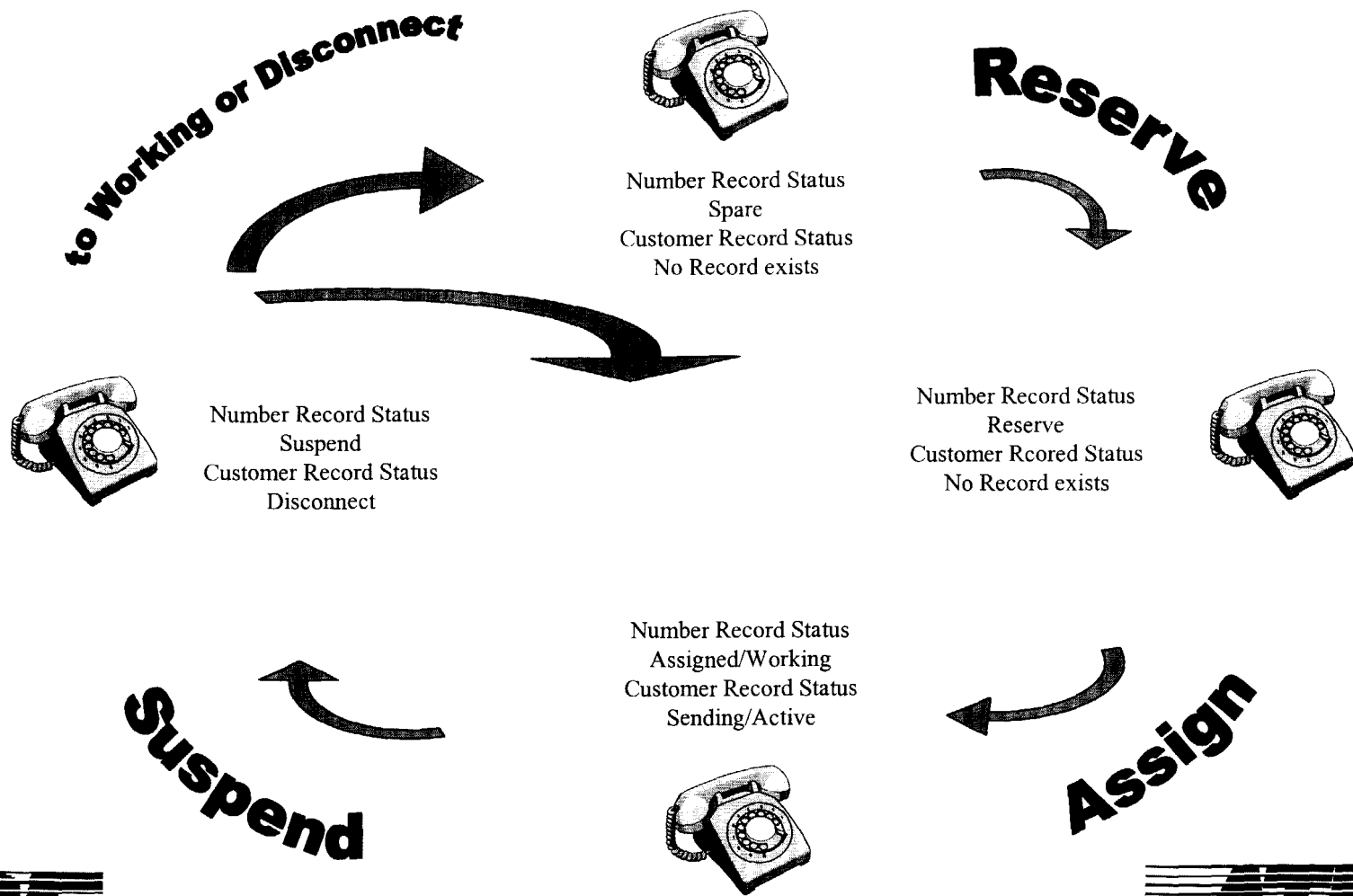 - Need Unsolicited messages for any Help Desk changes

Suspend

- ## Current Proposed Design

  - Only returned to Working status
  - Customer record in Disconnect status
  - Cannot specify period to remain in Suspend status

- ## Alternative Proposed Design

  - Should go to Disconnect or Working status after End Intercept specified by the user
  - Unsolicited messages should be sent for any status change
  - Status of Customer record should be Suspend
  - Suspend status should only be viewable by Control RO

Proposed Non Pay

to Working or Disconnect

Number Record Status
Spare
Customer Record Status
No Record exists

Reserve

Number Record Status
Suspend
Customer Record Status
Disconnect

Number Record Status
Reserve
Customer Rcored Status
No Record exists

Number Record Status
Assigned/Working
Customer Record Status
Sending/Active

Suspend

Assign

CBF

ATS